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*Attorneys for Defendant*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

THE HERTZ CORPORATION,

Plaintiff,

vs.

MARCOS ALEJANDRO LEON-SANCHEZ,  
 WHITNEY MILIAN-CONCEPCION,  
 DENNIS LEONARDO RECONCO  
 UMANZOR, JUAN MANUEL NINO  
 BASTOS and ERODDYS CARRILLO  
 DIAZ,

Defendants.

CASE NO.: 2:20-CV-01561-APG-BNW

**MOTION AND PROPOSED ORDER TO  
 WITHDRAW AS COUNSEL OF RECORD**

**[HEARING NOT REQUESTED]**

**MOTION AND PROPOSED ORDER TO WITHDRAW AS COUNSEL OF RECORD**

DAVID A. TANNER, ESQ., respectfully moves this court for an order permitting David A. Tanner, Esq. ("Mr. Tanner"), who has appeared in these proceedings, to withdraw as counsel for ERODDYS CARRILLO DIAZ ("Mr. Diaz"), in the above captioned matter, pursuant to Local Rule IA 11-6, S.C.R 46, and NRCP 1.16(b)(1) and (7).

...

...

1 This Motion is made and based upon the Memorandum of Points and Authorities  
2 submitted herein, the Declaration of David A. Tanner, Esq., attached hereto, the pleadings and  
3 papers on file herein, and any argument adduced at the hearing of this Motion to Withdraw as  
4 Counsel of Record.

5  
6 DATED this 25 date of October, 2021.

7  
8  
9  
10 By: 

11 DAVID A. TANNER, Esq.  
12 Nevada Bar No. 8282  
13 **TANNER CHURCHILL ANDERSON**  
14 4001 Meadows Lane  
15 Las Vegas, NV 89107  
16 Telephone (702) 868-8888  
17 Facsimile (702) 868-8889  
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19 *Attorneys for Plaintiff*  
20  
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22  
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I.

**MEMORANDUM OF POINTS AND AUTHORITIES**

This is an action claiming damages sustained from a motor vehicle accident that occurred on October 31, 2019.

Defendant's counsel, Mr. Tanner has no involvement and has not been handling this case. David Churchill, Esq. and Jared Anderson, Esq. are the lead attorneys handling this case.

Additionally, Local Rule IA 11-6 (e) provides that "no withdrawal... shall be approved if delay of discovery, the trial or any hearing in the case would result." Here, no delay of any kind will result from Mr. Tanner's withdrawal because the pretrial order deadline is not until December 29, 2021. Mr. Tanner's withdrawal will not prejudice either party or delay any proceeding in this matter.

II.

**CONCLUSION**

For the reasons set forth above, Mr. Tanner respectfully moves this Court to enter an Order approving the withdrawal of Mr. Tanner as a representing attorney for Mr. Diaz in the instant matter.

DATED this 25 date of August, 2021.

By:

  
DAVID A. TANNER, Esq.

Nevada Bar No. 8282

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*Attorneys for Plaintiff*

**Order**

**IT IS SO ORDERED**

**DATED:** 2:53 pm, October 26, 2021



**BRENDA WEKSLER**

**UNITED STATES MAGISTRATE JUDGE**

1 DAVID A. TANNER, Esq.

Nevada Bar No. 8282

2 DAVID J. CHURCHILL, Esq.

Nevada Bar No. 7308

3 JARED B. ANDERSON, Esq.

Nevada Bar No. 9747

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*Attorneys for Defendant*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 THE HERTZ CORPORATION,

13 Plaintiff,

14 vs.

16 MARCOS ALEJANDRO LEON-SANCHEZ,

WHITNEY MILIAN-CONCEPCION,

17 DENNIS LEONARDO RECONCO

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18 BASTOS and ERODDYS CARRILLO

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20 Defendants.

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**[HEARING NOT REQUESTED]**

21 COMES NOW, DAVID A. TANNER, ESQ., who after first being duly sworn, deposes  
22 and says:

23 1. That the declared is counsel of record for Defendant in the above referenced  
24 matter.

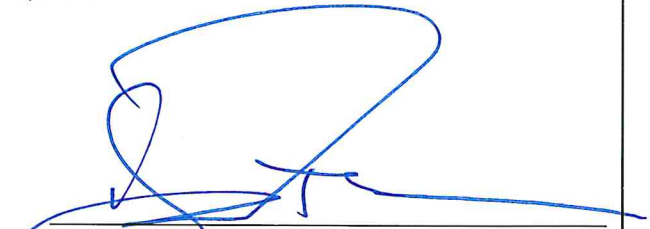
25 2. That the declared is applying to withdraw as counsel of record in this matter as he  
26 is not the handling attorney in this case.

27 3. The Amended Complaint in this matter was filed on December 14, 2020.  
28

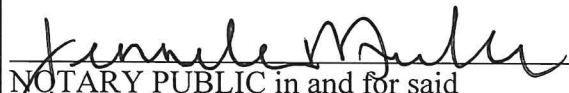
1           4.       The Stipulated Discovery Plan and Scheduling Order was ordered on May 4, 2021.

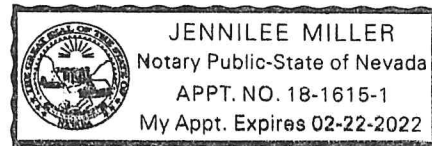
2           5.       Accordingly, Defendant's counsel is seeking to be relieved of his duties as counsel  
3 of record in this case.

4  
5           DATED this 24 date of October, 2021.

6  
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9             
10          DAVID A. TANNER, ESQ.

11       SUBSCRIBED and SWORN to before me  
12 this 25 day of October, 2021.

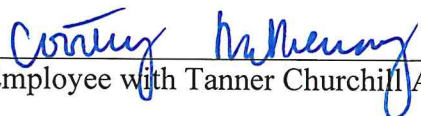
13         
14       NOTARY PUBLIC in and for said  
15       County and State



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of the law firm of TANNER CHURCHILL  
ANDERSON and that on the 25 day of October, 2021, I served the above and foregoing  
**MOTION AND PROPOSED ORDER TO WITHDRAW AS COUNSEL OF RECORD** by  
Electronic Service to the following:

William C. Reeves, Esq.  
**MORALES FIERRO & REEVES**  
600 S. Tonopah Drive, Suite 300  
Las Vegas, NV 89106  
*Attorneys for Plaintiff*

  
An Employee with Tanner Churchill Anderson